## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

IRONWORKS PATENTS, LLC,	•
Plaintiff,	Case No. 17-1399-RGA
v.	
APPLE INC.,	
Defendants.	

## JOINT MOTION TO DISMISS AND PROPOSED ORDER

Plaintiff Ironworks Patents, LLC and Defendant Apple Inc. have reached a settlement agreement that resolves all matters in this controversy between them and jointly move the Court to dismiss the above-captioned action as follows:

IT IS HEREBY ORDERED that all claims, counterclaims, and defenses that have been, or could have been, asserted in this lawsuit against Apple Inc. by Ironworks Patents, LLC are dismissed with prejudice.

IT IS HEREBY ORDERED that all claims, counterclaims, and defenses that have been or could have been asserted in this lawsuit against Ironworks Patents, LLC by Apple Inc. are dismissed without prejudice.

IT IS HEREBY ORDERED that all attorneys' fees, costs of court, and expenses shall be borne by each party incurring the same.

IT IS HEREBY ORDERED that the Court shall retain jurisdiction to enforce the settlement agreement.

Dated: November 30, 2018

## FARNAN LLP

/s/ Michael J. Farnan
Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 N. Market St., 12th Floor
Wilmington, DE 19801
Telephone: (302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

David Berten (admitted Pro Hac) dberten@giplg.com
Alison Aubry Richards (admitted Pro Hac)
Arichards@giplg.com
Hannah Sadler (admitted Pro Hac)
hsadler@giplg.com
Global IP Law Group, LLC
55 W. Monroe St., Ste. 3400
Chicago, Illinois 60603
Phone: 312.241.1500

Attorneys for Plaintiff, Ironworks Patents, LLC

## POTTER ANDERSON & CORROON LLP

/s/ Bindu A. Palapura
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Stephanie E. O'Byrne (#4446)
Jennifer Penberthy Buckley (#6264)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
sobyrne@potteranderson.com
jbuckley@potteranderson.com

Xin-Yi Zhou (admitted pro hac vice) O'MELVENY & MYERS LLP 400 South Hope Street, 18<sup>th</sup> Floor Los Angeles, CA 90071 Tel: (213) 430-6000 vzhou@omm.com

Luann L. Simmons (admitted pro hac vice)
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28<sup>th</sup> Floor
San Francisco, CA 94111
Tel: (415) 984-8700
lsimmons@omm.com

Attorneys for Defendant, Apple Inc.

IT IS SO ORDERED this 30 day of November, 2018.

United States District Judge